

1 ANDREW A. BAO, ESQ.
2 Nevada Bar No. 10508
3 WOLFE & WYMAN LLP
4 6757 Spencer Street
5 Las Vegas, NV 89119
6 Telephone: (702) 476-0100
7 Facsimile: (702) 476-0101
8 aabao@wolfewyman.com

9
10 Attorneys for Defendant
11 CMG MORTGAGE, INC. D/B/A CMG FINANCIAL

12
13 UNITED STATES DISTRICT COURT
14 DISTRICT OF NEVADA

15 JEFFREY K. ENGLER and KATHERINE M.
16 SENNES-ENGLER,

17 Plaintiff,

18 v.
19 CMG MORTGAGE, INC. D/B/A CMG
20 FINANCIAL,

21 Defendant.

22 Case No. 2:19-cv-00869-GMN-BNW

23 [PROPOSED] STIPULATION AND
24 ORDER TO EXTEND DISCOVERY

25 [FIFTH REQUEST]

26 Pursuant to Fed. R. Civ. P. 26(f), and Local Rule 26-1, Plaintiffs Jeffrey K. Engler and
27 Katherine M. Sennes-Engler (“Plaintiffs”) and CMG Mortgage Inc. d/b/a CMG Financial (“CMG”)
28 (collectively the “Parties”), by and through their attorneys, hereby stipulate to extend discovery
deadlines and other deadlines in the June 11, 2020 Scheduling Order (ECF No. 29) as follows:

29 **1. Completed Discovery.**

30 The parties have exchanged initial and supplemental disclosures. Both parties have
31 responded to written discovery requests and produced documents.



1 **2. Remaining Discovery.**

2 Plaintiffs and Defendant's deposition, and additional production of documents.

3 **3. Good Cause.**

4 Since the last request, the parties have completed written discovery, with Defendant's
 5 deposition set for August 24, 2020 and Plaintiffs' depositions set for August 25, 2020. In preparing
 6 for the upcoming deposition, Defendant plan to disclose some additional documents that may be
 7 relevant to this action. In the unlikely event the proposed settlement is unsuccessful, the proposed
 8 extension hereto would allow Plaintiff's counsel (and Plaintiff's *pro hac vice* counsel, approved by
 9 the court on August 5, 2020) to have reasonable time to review these documents in advance of
 10 Defendant's deposition.

11 As to settlement, the parties have tentatively agreed on a settlement framework that would
 12 completely resolve this litigation, with performance of settlement terms beginning October 1, 2020.
 13 Thus, in addition to the pending production of documents and newly associated counsel, the parties
 14 are close to resolving this matter entirely. The proposed deadlines below correspond with this
 15 October 1, 2020 date, with the parties intending to proceed with the depositions if the matter is not
 16 resolved by said date rather than incurring the costs of three (3) depositions next week.

17 This stipulation is made in good faith, is not interposed for delay, and is not filed for an
 18 improper purpose. Furthermore, a trial date has not been set at this time.

19 **4. Current Deadlines.**

20 - Discovery Cutoff: **August 25, 2020**
 21 - Dispositive Motion deadline: **September 25, 2020**
 22 - Joint Proposed Pretrial Order: **October 26, 2020**

23 **5. Proposed Deadlines.**

24 - Discovery Cutoff: **September 25, 2020**

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1 - Dispositive Motion deadline: **October 26, 2020**
2 - Joint Proposed Pretrial Order: **November 30, 2020**

3 **IT IS SO STIPULATED.**

4
5 DATED: August 19, 2020

6 DATED: August 19, 2020

7 WOLFE & WYMAN LLP

8 FREEDOM LAW FIRM, LLC

9 By: /s/ Andrew A. Bao
10 ANDREW A. BAO, ESQ.
11 Nevada Bar No.: 10508
12 6757 Spencer Street
13 Las Vegas, NV 89119
14 *Attorneys for Defendant*
15 *CMG MORTGAGE, INC. D/B/A CMG*
16 *FINANCIAL*

17 By: /s/ George Haines
18 GEORGE HAINES, ESQ.
19 Nevada Bar No.: 9411
20 8985 S. Eastern Ave., Suite 350
21 Henderson, NV 89123
22 *Attorney for Plaintiffs*
23 *JEFFREY K. ENGLER AND KATHERINE M.*
24 *SENNES-ENGLER*



ORDER GRANTING

STIPULATION TO EXTEND DISCOVERY

In consideration of the parties' stipulation and good cause showing, **IT IS ORDERED THAT**
the June 11, 2020 Scheduling Order (ECF No. 29) shall be amended as follows:

- Discovery Cutoff: **September 25, 2020**
- Dispositive Motion deadline: **October 26, 2020**
- Joint Proposed Pretrial Order: **November 30, 2020**

IT IS SO ORDERED.

UNITED STATES MAGISTRATE JUDGE

Dated: August 20, 2020

